

Supplemental Amendment dated 6 February 2004

**REMARKS**

Applicants have corrected the drawing sheets to conform to the Notice of Non-Compliant Amendment. No new matter has been added. Accordingly, claims 1-20 remain pending in the application.

**CONCLUSION**

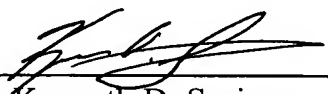
Applicant respectfully requests that the Examiner reconsider and reexamine the present application, allow claims 1-20, and pass the application to issue. In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact Kenneth D. Springer (Reg. No. 39,843) at (703) 715-0870 to discuss these matters.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 50-0238 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17, particularly extension of time fees.

Respectfully submitted,

VOLENTINE FRANCOS, P.L.L.C.

Date: 6 February 2004

By:   
Kenneth D. Springer  
Registration No. 39,843

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### **REMARKS**

Applicants gratefully acknowledge the Examiner's indication that claims 5, 6, 11 and 12 define patentable subject matter and statement that these claims would be allowable if rewritten in independent form, including all limitations of their respective base claims and any intervening claims.

Reexamination and reconsideration of the present application are requested.

Applicants have amended the specification to correct typographical and grammatical errors. No new matter has been added.

Claims 1-20 remain pending in the application.

### **INFORMATION DISCLOSURE STATEMENT**

Applicants respectfully request acknowledgment of the information disclosure statement (IDS) that Applicants filed on 31 July 2003 (a copy of the date-stamped postcard is attached hereto, the date-stamped postcard serving as *prima facie* evidence that Applicants did indeed file this IDS on 31 July 2003, prior to the mailing date of the first Office Action with respect to this application). Applicants also respectfully request that the Examiner fully consider all references cited in that IDS before issuing any further Action with respect to this application, and also request that the Examiner return to the Applicants an initialed copy of the PTO-1449 form.

### **DRAWINGS**

Applicants have attached replacement sheets for FIGs. 1, 2A-C, 3 and 8.

Accordingly, Applicants respectfully request that the Examiner withdraw the objections to the Drawings.

### **SPECIFICATION**

Applicants have amended paragraph [0044] to correct some minor

typographical errors.

Accordingly, Applicants respectfully request that the Examiner withdraw the objections to the Specification.

**35 U.S.C. § 103**

The Office Action rejected: claims 1-4, 7-10, 13-17, and 19-20 under 35 U.S.C. § 103 over Roof et al. U.S. Patent 4,843,533 (“Roof”); and claim 18 under 35 U.S.C. § 103 over Roof in view of Suzuki et al. U.S. Patent 5,710,988 (“Suzuki”).

Applicants traverse these rejections for at least the following reasons.

**Claim 1**

Among other things, the system of claim 1 includes an emergency cutoff circuit for controlling a power relay selectively connecting the AC power to the facility.

The Office Action states that element 132 of FIG. 1 of Roof corresponds to the recited emergency cutoff circuit for controlling a power relay selectively connecting the AC power to the facility.

Applicants respectfully disagree.

Element 132 in FIG. 1 of Roof controls the switch 142. However, the switch 142 does not “selectively connect the AC power to the facility.” Indeed, as clearly shown in FIGs. 1 and 2, switch 142 is connected in series with resistor 140 across a DC Bus 112 defined by conductors 114 and 116 on the output side of the 3-phase rectifier 160 and does not connect or disconnect AC (or DC) power to anything. Instead, the switch 142 merely serves to connect the resistor 140 between the positive conductor 114 and the negative conductor 116 to discharge excess voltage stored on the capacitor 118 whenever a transient above a predetermined voltage level occurs.

Accordingly, the control circuits 132 of Roof do not “control a power relay selectively connecting the AC power to the facility” as featured in claim 1.

Furthermore, neither the 3-phase rectifier 160 nor the capacitor 118 constitute a “first power controller for releasing a stored DC voltage when transient power interruption occurs.” Indeed, no stored DC voltage is ever “released” in Roof.

Finally, the Office Action states that element 162 of FIG. 2 corresponds to the recited second power controller. However, Roof clearly discloses that FIG. 2 is nothing more than FIG. 1 shown in block diagram form and that logic circuit 162 actually control circuits 132 and voltage sense circuit 144. So, it is unclear how the Office Action can state that element 132 is both the emergency cutoff element and the separately-recited second power controller.

Accordingly, for at least these reasons, Applicants respectfully submit that claim 1 is patentable over Roof.

#### Claims 2-4

Claims 2-4 depend from claim 1 and are deemed patentable over Roof for at least the reasons set forth above with respect to claim 1. Applicants also respectfully traverse the statements in the Office Action to the effect that Roof “teaches or fairly suggests” the features of claims 2 and 3. Because the claims are already deemed allowable for the reasons set forth above, Applicants do not deem it necessary to further expound upon each and every patentable difference between the claims and Roof.

#### Claim 7

Among other things, the system of claim 7 includes an emergency cutoff circuit for controlling a power relay selectively connecting the AC power to the manufacturing system.

As explained above with respect to claim 1, Roof does not disclose any such emergency cutoff circuit for controlling a power relay selectively connecting the AC power to the manufacturing system.

Furthermore, the system of claim 7 includes a control device for operating a second device and for supplying an operation voltage to the second device through a power supply, the power supply converting the DC voltage into an operation voltage for the second device when the transient power interruption occurs.

Applicants respectfully submit that Roof discloses no such features.

The Office Action makes no mention of where Roof supposedly discloses a “second device” for controlling a specific process condition and which receives the operation voltage from the control device. Indeed, Roof only discloses a single device (motor 130) which receives an operation voltage from its AC inverter 100.

Accordingly, for at least these reasons, Applicants respectfully submit that claim 7 is patentable over Roof.

#### Claims 9-10

Claims 9-10 depend from claim 7 and are deemed patentable over Roof for at least the reasons set forth above with respect to claim 7. Applicants also respectfully traverse the statements in the Office Action to the effect that Roof “teaches or fairly suggests” the features of claims 9 and 10. Because the claims are already deemed allowable for the reasons set forth above, Applicants do not deem it necessary to further expound upon each and every patentable difference between the claims and Roof.

#### Claim 13

Among other things, the system of claim 13 includes a second power controller **receiving the first DC voltage and generating therefrom a second DC voltage**, the first power controller storing the second DC voltage and providing the second DC voltage to at least one device in the manufacturing facility **when the transient power interruption occurs**.

Applicants respectfully submit that Roof does not disclose any such features.

At the outset, the Office Action fails to mention a second power controller **receiving a first DC voltage and generating therefrom a second DC voltage**. Indeed, Roof the only DC voltage generated and stored in Roof is the DC voltage across the single DC bus 112, stored by the capacitor 118.

Accordingly, for at least these reasons, Applicants respectfully submit that claim 13 is patentable over Roof.

#### Claims 14-17 and 19-20

Claims 14-17 and 19-20 depend from claim 13 and are deemed patentable over

Roof for at least the reasons set forth above with respect to claim 13. Applicants also respectfully traverse the statements in the Office Action to the effect that Roof "teaches or fairly suggests" the features of claims 14, 16, 17 and 19. Because the claims are already deemed allowable for the reasons set forth above, Applicants do not deem it necessary to further expound upon each and every patentable difference between the claims and Roof. However, Applicants would like to note that in the rejections of claims 16 and 17, the Examiner has cited the exact same elements 110 and 118 of Roof in one instance (claim 16) as supposedly corresponding to the recited first power controller, and in another instance (claim 19) as supposedly corresponding to the separately-recited second power controller. Applicants respectfully traverse any such self-contradictory rejections.

#### Claim 18

Claim 18 depends from claim 13. Suzuki does not remedy the shortcomings of Roof as set forth above with respect to claim 13.

Furthermore, Applicants traverse the proposed combination of Suzuki with Roof as lacking proper motivation in the prior art, and because Suzuki, which pertains to a tiny hand-held pointer/infra-red transceiver, is not pertinent prior art.

Accordingly, for at least these reasons, Applicants respectfully request that the Examiner withdraw the rejection of claim 18.

#### CONCLUSION

In view of the foregoing explanations, Applicants respectfully request that the Examiner reconsider and reexamine the present application, allow claims 1-20, and pass the application to issue. In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact Kenneth D. Springer (Reg. No. 39,843) at (703) 715-0870 to discuss these matters.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 50-0238 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. §

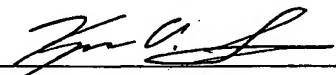
1.17, particularly extension of time fees.

Respectfully submitted,

VOLENTINE FRANCOS, P.L.L.C.

Date: 23 December 2003

By: \_\_\_\_\_

  
Kenneth D. Springer

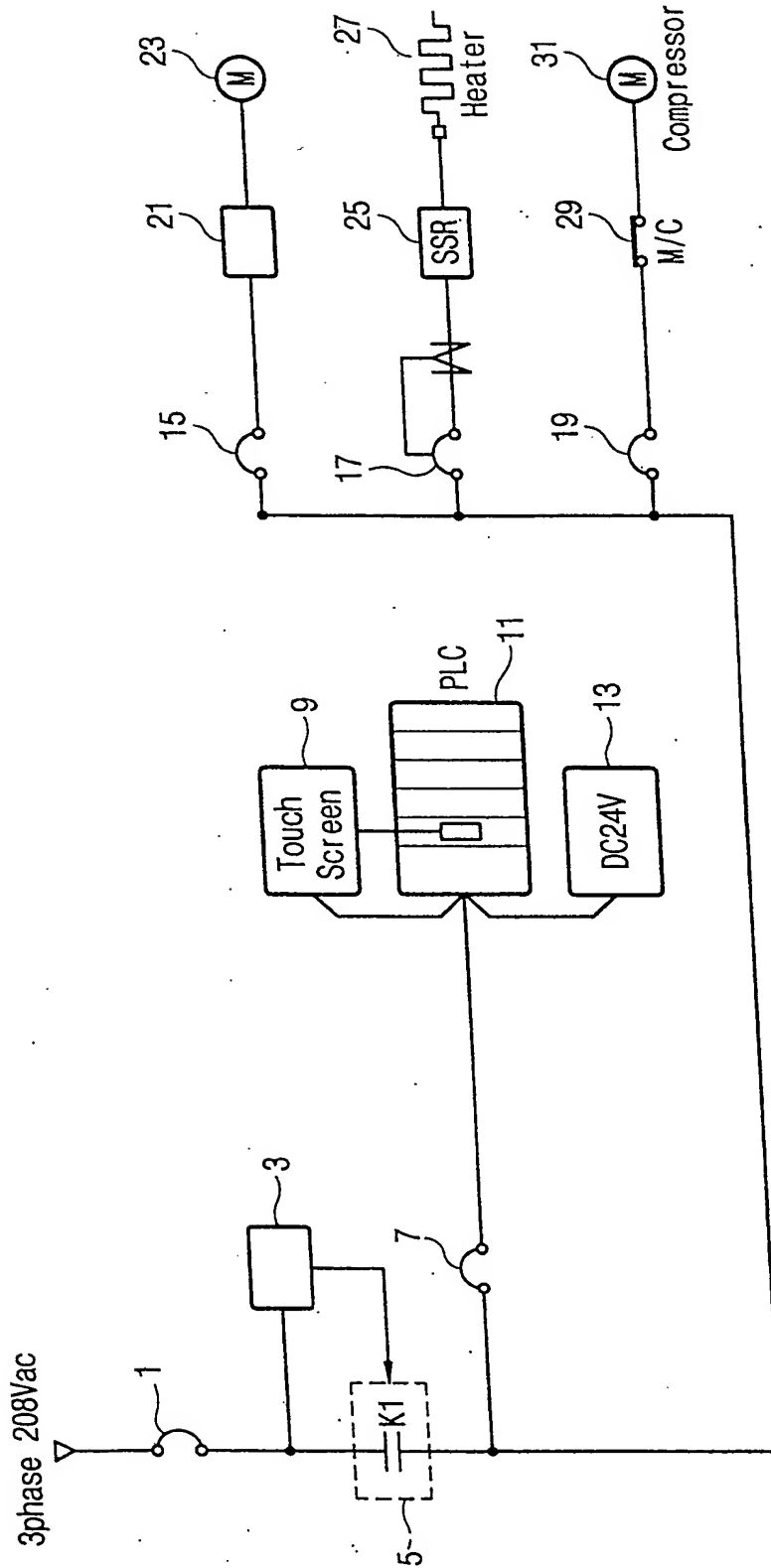
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Annotated Marked-up  
Drawings

Fig. 1  
PRIOR ART







Annotated Marked-up Drawings

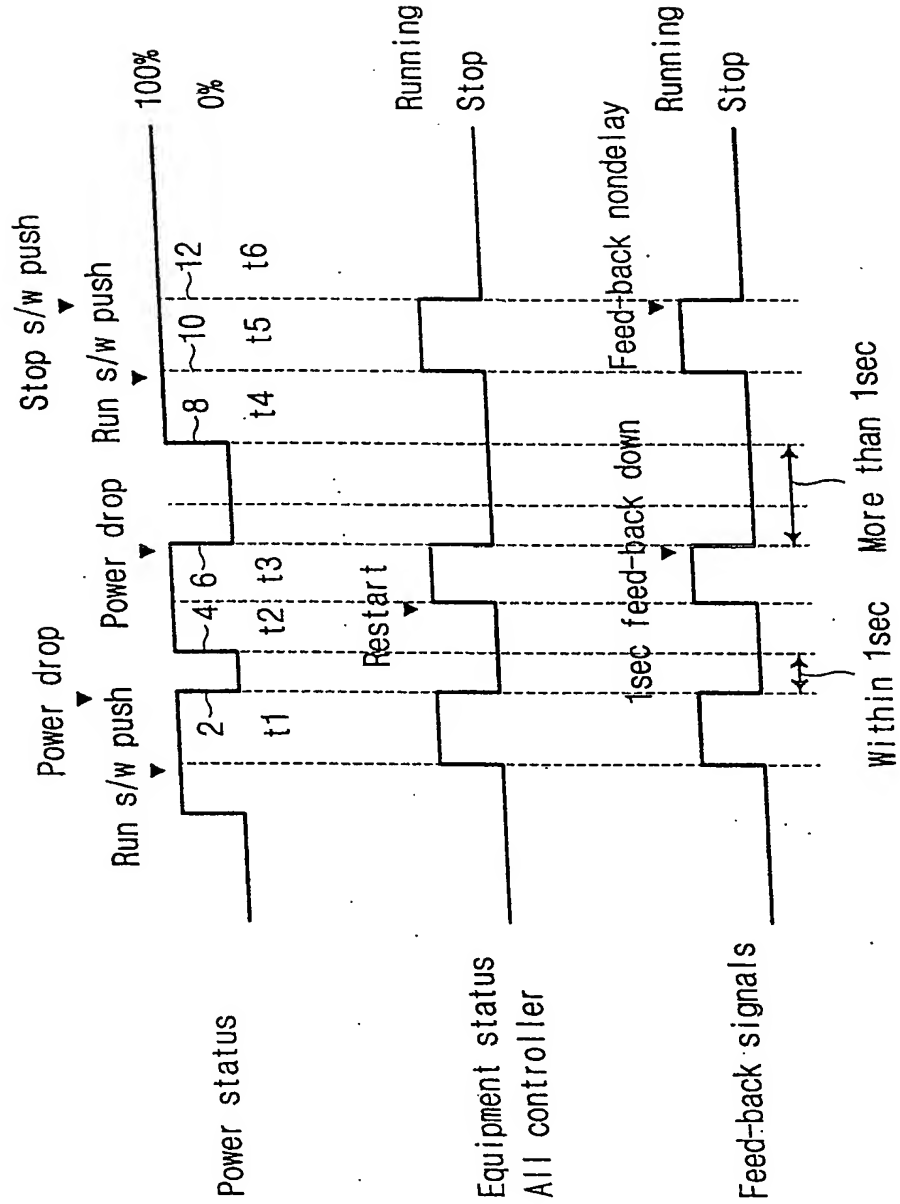


Fig. 2A  
PRIOR ART

Fig. 2B  
PRIOR ART

Fig. 2C  
PRIOR ART

Fig. 3

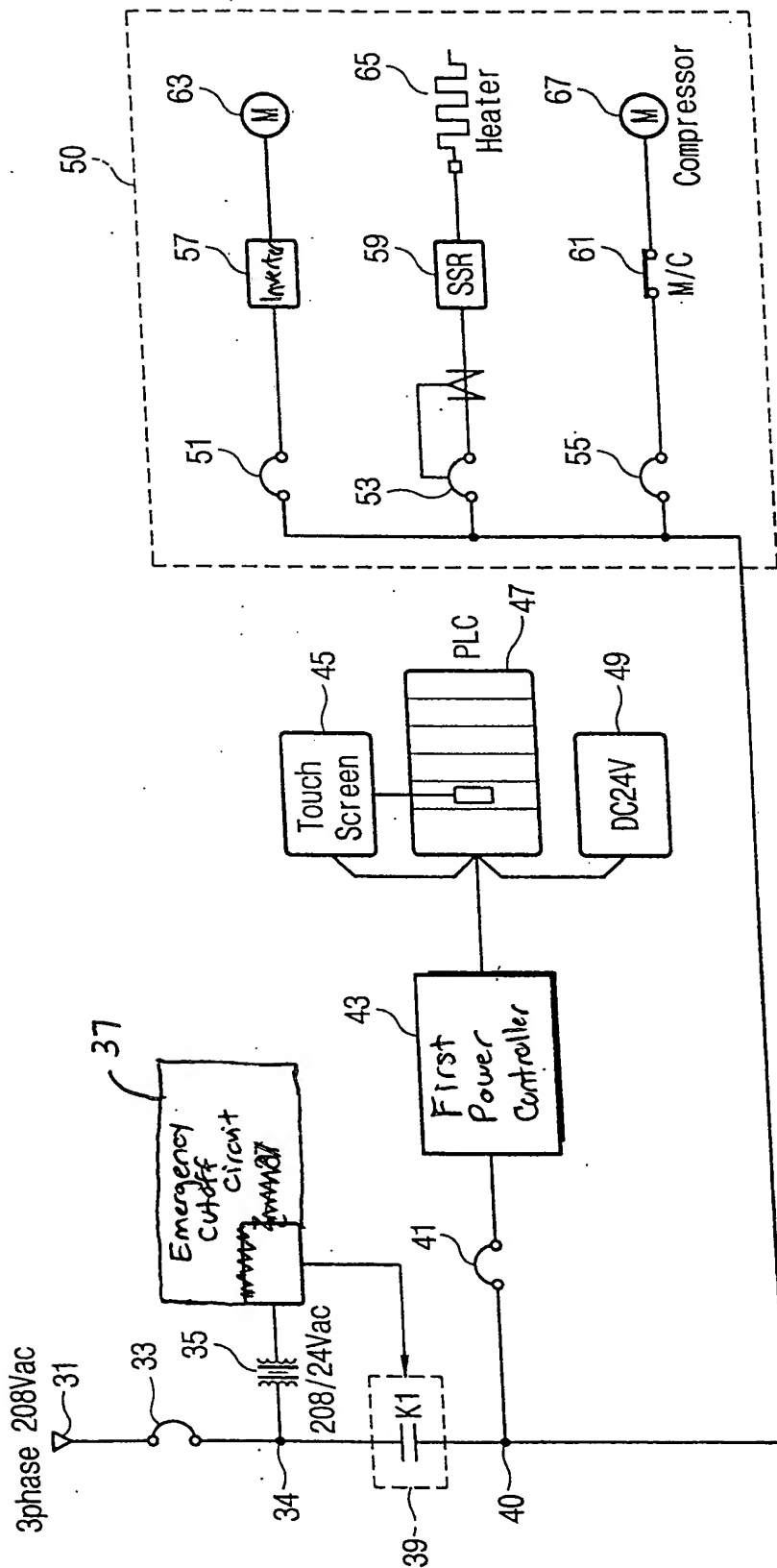


Fig. 8

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